

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America)
)
)
) Case No. 1:23-mj-93
v.)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2022 to present in the county of Hamilton in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 846 - Conspiracy to commit narcotics trafficking

This criminal complaint is based on these facts:

See Affidavit

Continued on the attached sheet.

Eric S Persing
Complainant's signature

Eric Persing, DEA Task Force Officer
Printed name and title

Sworn to before me and signed in my presence.

2/8/23

Date: _____

Karen L. Litkovitz

Judge's signature

City and state: Cincinnati, Ohio

Hon. Karen L. Litkovitz, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Eric S. Persing, Task Force Officer (TFO) with the Drug Enforcement Administration (DEA), being duly sworn, hereby does depose and say:

INTRODUCTION

1. This affidavit is made in support of a criminal complaint charging **STEPHEN WHEELER** (hereinafter, “**WHEELER**”) and **ROMELLO WHEELER** (hereinafter, “**ROMELLO**”) with violations of United States law, specifically 21 U.S.C. §§ 841 and 846 (conspiracy to possess with intent to distribute controlled substances). This affidavit is submitted for the limited purpose of demonstrating probable cause for the issuance of a criminal complaint, and therefore does not contain each and every fact that I know about the investigation.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1).

3. I am a Parole Officer with the Ohio Department of Rehabilitation and Corrections Adult Parole Authority, Hamilton County, Ohio, and have been so employed with Ohio Department of Rehabilitation and Corrections for the last 7 years where I have been assigned as a Field Training Officer, in-service instructor, and Fugitive Apprehension Team leader. I was assigned to the United States Marshal Service (USMS) Fugitive Task Force in 2021 and am currently assigned as a TFO with the DEA Cincinnati District Office (“DEA Cincinnati”) and have been so assigned since January of 2022.

4. As a TFO with the DEA, my duties include the investigation of violations of federal law concerning the importation, manufacture, possession and distribution of controlled substances

as defined by Title 21, United States Code, including controlled substances such as heroin, cocaine, methamphetamine, marijuana, illicitly diverted pharmaceuticals, and other dangerous drugs. During the current assignment with the DEA, I have participated in numerous investigations involving drug trafficking and money laundering. I earned a Bachelor of Science Degree from the University of Cincinnati and have had frequent discussions with other experienced law enforcement officers, as well as admitted narcotics traffickers, confidential sources, witnesses, and cooperating defendants concerning the methods and practices of drug traffickers. I have also participated in all aspects of drug investigations, including physical surveillance, undercover operations, execution of search warrants, seizure of assets, and arrests of drug traffickers. I am the case officer on this case, and so being, is fully aware of the facts of the case.

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

6. Based on my training, experience, and the facts as set forth in this affidavit, there is probable cause to charge **WHEELER** and **ROMELLO** via criminal complaint with conspiracy to possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance; 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; and a detectable amount of marijuana, a Schedule I controlled substance; in violation of 21 U.S.C. §§ 841 and 846.

PROBABLE CAUSE

7. Since July 2022, the DEA has been investigating the activities of WHEELER,

ROMELLO, and other co-conspirators (collectively, the “**WHEELER DTO**”), a large scale drug trafficking organization that is a major source of illegal narcotics in Cincinnati, Ohio, including cocaine, fentanyl, methamphetamine, and marijuana. Agents have identified **WHEELER** as the head of the **WHEELER DTO** and his son, **ROMELLO**, as the primary distributor.

8. The **WHEELER DTO** utilizes multiple vehicles, registered under different names, to transport their contraband, which they store at various apartment buildings. Through the course of the investigation, agents have identified that the **WHEELER DTO** primarily utilizes the following locations:

- a. Industry Apartments, 1118 Sycamore Street, Unit #626, Cincinnati, Ohio 45202 (the “Wheeler Apartment”) is a high-end, luxury apartment that costs \$4,200 a month to rent. The Wheeler Apartment is **WHEELER**’s primary residence. Both **WHEELER** and **ROMELLO** use the Wheeler Apartment to store narcotics, to store drug sale proceeds, and to conduct drug transactions.
- b. 2515 Burnet Avenue, Unit #1011, Cincinnati, Ohio 45219 (the “Wheeler Stash House”) is another high-end apartment that the **WHEELER DTO** uses to store narcotics, to store drug sale proceeds, and to conduct drug transactions.

9. Over the course of the last seven months, agents have observed a repeated pattern of **WHEELER** and **ROMELLO**, working in concert, making frequent stops at both the Wheeler Apartment and Wheeler Stash House before and after conducting suspected drug transactions and other activities consistent with drug trafficking. **WHEELER** and **ROMELLO** often stop at the Wheeler Stash House and Wheeler Apartment for only short periods of time, entering and exiting

carrying a bookbag, consistent with drug traffickers picking up or dropping off contraband at their stash house. Moreover, **WHEELER** and **ROMELLO** are known to change their appearance and clothing during these short stops and regularly conduct counter surveillance measures, such as driving evasively, systematically driving in indirect routes with frequent stops to watch traffic and identify law enforcement.

10. For instance, on July 18, 2022, **WHEELER** was observed picking up suspected narcotics and/or drug proceeds from the Wheeler Stash House. On August 3, 2022, **ROMELLO** was observed conducting a suspected drug transactions before returning directly to the Wheeler Stash House. On August 11, 2022, **ROMELLO** drove directly to PL\$ Check Cashing after conducting an apparent drug transaction and dropped off suspected drug proceeds. **WHEELER** arrived at the same PL\$ Check Cashing location a few minutes later, interacted with an employee, and then drove directly to the Wheeler Stash House, likely transporting the drug proceeds that **ROMELLO** had just dropped off. On January 30, 2023, **WHEELER** was seen originating from the Wheeler Apartment before conducting a suspected drug transaction and/or money pick up. And on February 2, 2023, agents observed a meeting between the **WHEELER DTO** and their suspected source-of-supply (SOS), as discussed below.

11. On February 2, 2023, **WHEELER** was surveilled leaving the Wheeler Apartment and driving directly to the Wheeler Stash House. Shortly thereafter, **ROMELLO** arrived at the Wheeler Stash House. The SOS then arrived at the Wheeler Stash House, driving one of **WHEELER**'s BMWs, which he had been seen operating on multiple occasions while in town. **ROMELLO** met the SOS in the parking lot and then escorted him inside the Wheeler Stash House. **WHEELER**, who had arrived earlier, was already inside. After the meeting, agents followed **ROMELLO** as he drove directly to a storage unit facility in Oakley, later identified as Public

Storage Unit #2261 located at 2900 Disney Street, Cincinnati, Ohio 45209 (the “Wheeler Storage Unit”).¹ **ROMELLO** quickly retrieved something from and/or dropped something off at the Wheeler Storage Unit before departing.

12. The next day, **ROMELLO**, the SOS, and a female began driving southbound on interstate 75 in WHEELER’s BMW. After crossing into Georgia, an interdiction team comprised of Bartow County Sheriff deputies observed the vehicle and initiated a traffic stop. During the traffic stop, a K9 unit alerted positively to the presence of narcotics inside the BMW. The interdiction team then searched the car and found two bags of marijuana (nineteen grams in total) and \$55,000 of bulk U.S. currency (rubber banded in large stacks of varying denominations, consistent with the transportation of narcotics proceeds).

13. On February 7, 2023, with the consent of Public Storage’s Management, agents conducted an open air sniff test of the Wheeler Storage Unit, where the narcotics detection K9, “Duce,” alerted positively to the presence or odor of narcotics. Agents then obtained and executed a search warrant for the Wheeler Storage Unit. Inside the Wheeler Storage Unit, agents found multiple kilograms of suspected controlled substances. Agents field tested and weighed the controlled substances, which came back as 1,900 grams of methamphetamine and 1,340 grams of fentanyl.

14. Later that same day, agents executed a number of federal search warrants at residences and vehicles used by the **WHEELER DTO**. At the Wheeler Apartment, where **WHEELER** lived, agents found 212.6 pounds of marijuana, a loaded FN Herstal Belgium pistol,

¹ The Wheeler Storage Unit was leased under the name Mikelle D. Hill, ROMELLO’s suspected girlfriend. The WHEELER DTO uses her name to register various pieces of property, including numerous vehicles ROMELLO and WHEELER utilize. Moreover, Public Storage’s records also reflected that ROMELLO had entered the storage unit facility on February 2, 2023, driving a Mitsubishi, and accessing the Wheeler Storage Unit, which is consistent with what agents witnessed. Accordingly, based on the investigation to this point, law enforcement believes that the Wheeler Storage Unit is maintained by ROMELLO to store drugs on behalf of the WHEELER DTO

a large amount of bulk U.S. currency, and assorted paraphernalia (digital scale, cutting agents, vacuum sealer and bags, packaging equipment and materials, ammunition, etc.). Agents also seized a kilo-sized brick of suspected cocaine from **WHEELER**'s Kia Stinger, which was parked in the parking garage of the Wheeler Stash House, and more assorted drug paraphernalia inside the apartment vacuum sealer, packaging equipment and materials, multiple scales, cutting agents, ammunition and a locked gun box, etc.). The brick of suspected cocaine was field tested and came back presumptive as 962.5 grams of cocaine.

15. Based on my training, experience, and the facts above, there is probable cause to believe that **WHEELER** and **ROMELLO** conspired to possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance; 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; and a detectable amount of marijuana, a schedule I controlled substance; in violation of 21 U.S.C. §§ 841 and 846.

Respectfully submitted,

Eric S Persing

Eric S. Persing
Task Force Officer
Drug Enforcement Administration

Subscribed and sworn to before me via FaceTime
on this 8 day of February 2023

Karen L. Litkovitz

Honorable Karen L. Litkovitz
United States Magistrate Judge